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DOCKETS
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Medical School
Department of Surgery
Section of Pediatric Surgery

Docket No. NHTSA-99-5891-23

October 18, 1999

Docket Management, Room PL-40 1
400 Seventh Street, SW
Washington, DC 20590

My petition of December 4, 1997, initiated this docket. Since that time, much having to do with child passenger protection in newer vehicles has transpired, but nothing has really changed with regard to the problem of restraining children weighing over 40 pounds in seats with lap-only belts. On the horizon, however, is the prospect of a new forward-facing child restraint, which does not convert to a booster, that will be able to handle children up to perhaps 60 pounds without a tether, not only according to the old 8 13-mm limit but the new 720-mm limit as well. The key here was to separate the two functions (CR vs booster), so that performance as a child restraint could be optimized.

Still, this is only one product, and it will have a tray shield rather than a **5-point** harness. I have read the letters submitted to the docket by parents wanting a variety of solutions, including regular child restraints and combination CR/boosters with **5-point** harnesses for their young but heavy children. This need can still be met by modifying the standard in a timely fashion in the manner I suggested and allowing for retroactive certification by **manufacturers if they** so choose. If nothing else, it could be an interim solution which would expire **after** two years, when new products may have eliminated its need.

I am not responding to your specific questions, because I believe they are not particularly relevant to the immediate issue, and others have made all the necessary points. I also believe that some of the responses are off the mark because of your misinterpretation and/or misstatement of my petition in the notice. Upon rereading my petition, I believe that I made my case well, and my reasons stand.

I look forward to a swift resolution to this matter.

Yours truly,



Kathleen Weber
Project Director

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